

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:)	Chapter 11
)	
KAL FREIGHT INC., <i>et al.</i> ¹)	Case No. 24-90614 (CML)
)	
Debtors.)	(Jointly Administered)
)	

**OFFICIAL UNSECURED CREDITORS' COMMITTEE'S
WITNESS & EXHIBIT LIST
FOR HEARING ON MARCH 12, 2025, AT 10:00 A.M.**

The Official Committee of Unsecured Creditors (the “Committee”) of Kal Freight Inc. and its affiliated debtors and debtors-in-possession (collectively, the “Debtors”) files this Witness & Exhibit List for the hearing on Wednesday, March 12, 2025, at 10:00 a.m., prevailing central time (the “Hearing”), before the Honorable Christopher M. Lopez, United States Bankruptcy Judge.

WITNESSES

The Committee may call any of the following witnesses at the Hearing:

1. Any witness called or designated by any other party.
2. Any witness necessary to impeach the testimony of any witness called or designated by any other party.
3. Any witness necessary to rebut the testimony of any witness called or designated by any other party.

The Committee reserves the right to cross-examine any witness called by any other party.

¹ The Debtors in these chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification numbers, are: KAL Freight Inc. (0249); KAL Aviation LLC (2600); KAL Partz Inc. (0139); KAL Trailers & Leasing Inc. (0840); and KVL Tires Inc. (0320). The location of the Debtors' Service address in these Chapter 11 Cases is 10156 Live Oak Ave., Fontana, CA 92335.

EXHIBITS

The Committee may offer into evidence one or more of the following exhibits at the Hearing:

Ex. #	Description of Exhibit	Offered	Objection	Admitted
A.	Debtors' Emergency Motion for Entry of an Order (I) Approving Binding Settlement Term Sheet with Participating Lenders and Committee, (II) Authorizing Relief from Automatic Stay and/or Abandonment of Certain Collateral, and (III) Granting Related Relief [Docket No. 691]			
	Any pleadings, reports, proofs of claim, or other documents filed of record in the Debtors' bankruptcy cases			
	Any exhibits offered or identified by any other party			
	Any exhibits necessary for impeachment purposes			
	Any exhibits for rebuttal purposes			
	Any appendices, exhibits, or other attachments to any of the foregoing			

The Committee reserves the right to supplement and/or amend this Witness & Exhibit List prior to the Hearing.

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DATED: March 10, 2025

Respectfully submitted,

KANE RUSSELL COLEMAN LOGAN PC

/s/ Kyle Woodard

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***Proposed Co-Counsel for Official
Committee of Unsecured Creditors***

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on March 10, 2025, a true and correct copy of the foregoing Witness & Exhibit List was filed with the Court and served via the Court's CM/ECF system upon all parties registered to receive such electronic service in this bankruptcy case.

/s/ Kyle Woodard
Kyle Woodard